

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF GEORGIA
COLUMBUS DIVISION

| | | |
|-------------------------|---|---------------------------|
| ROBERT H. WRIGHT, JR., |) | |
| |) | |
| Plaintiff, |) | CIVIL ACTION |
| |) | FILE NO. 4:15-cv-34 (CDL) |
| v. |) | |
| |) | |
| S/A JERALD WATSON and |) | |
| SGT. JONATHAN GOODRICH, |) | |
| |) | |
| Defendants. |) | |

PLAINTIFF'S DEPOSITION DESIGNATIONS

Plaintiff intends to call the following witnesses live. However, should any witness be unavailable, Plaintiff intends to read the following portions of each deposition into evidence at trial (with objections and colloquy omitted):

WITNESS:

PAGE AND LINE NUMBERS:

- | | | |
|----|-------------------------------|---|
| 1. | Sheriff Robert Michael Jolley | 7:9-7:25, 9:20-10:12, 12:18-16:15, 18:4-18:20, 19:8-20:19, 21:1-24:12 |
| 2. | Sergeant Michael Pitts | 8:2-8:7, 9:12-9:22, 11:20-12:8, 15:14- 16:24, 17:25-18:4, 20:25-22:14, 23:10-24:22, 25:10-17, 26:6-26:12, 28:17-35:24, 41:4-45:7, 50:12-56:15, 60:22-62:15, 65:25-75:5, 80:1-87:15, 94:14-94:19, 95:10-95:12 |
| 3. | Sergeant Jonathan Goodrich | 7:14-8:4, 13:10-13:15, 13:19-13:25, 14:20-15:15, 19:9-52:10, 52:25-54:13, 55:23-58:7, 60:2-68:13 |

4. S/A Jerald Watson 6:1-6:12, 7:12-7:14, 9:8-10:8, 16:15-20:15, 29:19-38:11, 42:7-42:11, 48:8-49:8, 52:7-55:23, 57:11-58:6, 58:24-60:19, 61:17-64:13, 68:16-82:18, 82:22-83:8, 84:7-97:19
5. TFC Paul Wofford 5:19-5:22, 6:3-7:3, 24:17-30:9, 32:23-33:13, 35:8-36:21, 38:5-50:18, 53:3-54:24
6. TFC Mark Bracewell 8:7-8:19, 9:22-11:2, 12:2-13:6, 14:18-14:22, 15:21-18:13, 20:12-20:18, 27:16-27:17, 29:7-31:1, 31:21-35:25, 42:7-43:21, 47:11-75:7, 78:4-78:21
7. Michael S. Binion (DNR) 6:12-8:3, 9:1-22:16
8. Jeremy Bolen (DNR) 6:4-7:24, 8:23-9:18, 10:24-11:25, 23:8-24:1, 25:13-25:31, 28:6-30:23, 31:9-51:9, 51:20-52:10, 52:17-58:6, 58:16-61:6, 62:3-62:17, 63:1-69:3, 93:12-95:4
9. Sergeant Robert Austin 5:17-5:20, 6:4-12:10, 15:17-20:11, 21:5-25:20, 26:12-28:5, 29:10-29:14, 36:15-38:5, 45:8-45:25, 47:5-48:2
10. Captain Sven Armbrust 7:15-8:5, 21:8-22:2, 25:22-26:19, 28:2-29:9, 31:7-33:2, 33:12-14, 33:17-42:15, 47:16-52:17
11. Sergeant Lauren Stinson 7:16-8:7, 9:1-9:9, 9:17-12:15, 13:8-35:24, 51:9-54:6, 79:19-81:1

12. Magistrate Linda Webb 7:21-35:23 (entire deposition)

NOTE: Plaintiff also reserves the right to use any deposition in full or part for purposes of impeachment, rebuttal, or to refresh recollection as permitted by the Federal Rules of Evidence.

Respectfully submitted this 26th day of July, 2017.

/s/ Craig T. Jones

CRAIG T. JONES
Georgia Bar No. 399476
Counsel for Plaintiff

THE ORLANDO FIRM, P.C.
Decatur Court, Suite 400
315 West Ponce de Leon Avenue
Decatur, GA 30030
(404) 373-1800
craig@orlandofirm.com

CERTIFICATE OF SERVICE

I hereby certify that on this the this date I electronically filed the foregoing **Plaintiff's Deposition Designations** with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following attorneys:

Kenneth Drew Jones, Esq.
Russell A. Britt, Esq.
HALL BOOTH AND SMITH, PC
191 Peachtree St.
Suite 2900
Atlanta, GA 30303
kjones@hbss.net
rbritt@hallboothsmith.com

This the 26th day of July, 2017.

/s/ Craig T. Jones

Craig T. Jones
Georgia Bar No. 399476
Counsel for Plaintiff

THE ORLANDO FIRM, P.C.
Decatur Court, Suite 400
315 West Ponce de Leon Avenue
Decatur, GA 30030
(404) 373-1800
craig@orlandofirm.com